

**AFFIDAVIT OF FBI TFO KEITH LEDIN IN SUPPORT OF
APPLICATIONS FOR SEARCH WARRANTS**

I, KEITH LEDIN, state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Massachusetts State Trooper and an FBI Task Force Officer assigned to the FBI's Metro-Boston Gang Task Force. I have been employed as a State Trooper since November 2004. During my seventeen years as a State Trooper, I have been assigned to both the Uniformed Branch and the Division of Investigative Services. In August of 2014, I was assigned to the Southeastern Massachusetts Gang Task Force (SEMGTF). Over time, the SEMGTF has transitioned into the Metro Boston Gang Task Force (MBGTF). The MBGTF is a task force consisting of Troopers from the Massachusetts State Police Gang Unit, Agents from the Federal Bureau of Investigation (FBI), Detectives from Boston, Brockton, Westport, East Bridgewater and Bridgewater Police Departments and Sheriffs from both Suffolk and Bristol Counties. I have been cross-sworn into the FBI and the United States Marshals Service as a federal Task Force Officer.

2. My duties include but are not limited to investigating criminal gang organizations, including motorcycle gangs, and illicit narcotics enterprises, assisting in crime prevention and control, the investigation of firearm violations and offenses, and the investigation of narcotic violations and offenses. I have participated in hundreds of narcotics arrests, numerous illegal possession of firearm arrests, and long term and short term narcotic investigations. I have initiated and participated in investigations that involved physical surveillance, GPS monitoring, ping monitoring, Triggerfish location devices, pole camera monitoring, controlled purchases utilizing undercover officers, confidential informants, cooperating witnesses, the execution of knock and no-knock search warrants, the review of recorded (both audio and video)

conversations and criminal activities, and the analysis of telephone records. I have gained knowledge about the history, membership, and illegal activities of street gangs and motorcycle gangs operating in and around Metro Boston and Southeastern Massachusetts. I have conducted and participated in these investigations both in uniform patrol and in my current assignment. In addition, I have conducted and assisted in numerous undercover narcotic purchases, surveillance of narcotic transactions, and have participated in numerous search warrant executions involving criminal contraband. I have been the affiant in search warrants and co-affiant in wiretap investigations that have led to the seizure of criminal contraband including controlled substances and firearms. I have testified in courts throughout Massachusetts including Massachusetts Superior Court and District Court, as well as the U.S. District Court for the District of Massachusetts.

3. The information contained in this affidavit is based on my own investigation, oral and written reports by other law enforcement officers, physical surveillance, public records, database checks, medical records, information from victims, police surveillance camera footage, private security camera footage, information obtained from law enforcement authorities who have an expertise in investigating outlaw motorcycle gangs such as the Hells Angels Motorcycle Club (HAMC), the Sidewinders Motorcycle Club (SWMC), the Pagans Motorcycle Club (PMC), Confidential Informants, and witnesses. The dates and times in this affidavit are approximate. In particular, the times set forth in Schedule I are approximate times based on the time stamps on private security camera systems and police camera systems. Because this affidavit is submitted for the limited purpose of supporting the issuance of search warrants for the search locations, motorcycles, and individuals as detailed in the attached Schedule I, I have not presented every fact learned during the investigation or described every investigative technique employed, but

have set forth only that information necessary to fully support probable cause for the warrant.

Summary of Warrants and Offenses

4. I submit this affidavit in support of applications for search warrants authorizing the searches of [REDACTED] locations, [REDACTED] motorcycles, and [REDACTED] persons as outlined below and as set forth in more detail in Schedule I to this Affidavit. [REDACTED] locations are in Massachusetts, [REDACTED] locations are in New Hampshire, and [REDACTED] locations are in Rhode Island. Likewise, [REDACTED] persons and motorcycles are in Massachusetts, [REDACTED] persons and motorcycles are in New Hampshire, and [REDACTED] persons and motorcycles are in Rhode Island. This affidavit summarizes the relevant probable cause common to all locations, motorcycles, and subjects. Probable cause particular to each location, motorcycle, and individual is summarized by each individual in Schedule I to this Affidavit.

5. In sum, there is probable cause to believe that the [REDACTED] individuals identified in Schedule I (“SUBJECTS”) were participants in a violent armed attack on members and associates of the Pagans Motorcycle Club on Pleasant Street in Fall River on May 14, 2022. As outlined below and Schedule I, there is probable cause to believe that the SUBJECTS, and their conspirators: engaged in violent crimes in aid of racketeering, in violation of 18 U.S.C. §1959¹; engaged in a racketeering conspiracy in violation of 18 U.S.C. §1962(d); engaged in interstate travel, and the use of a facility of interstate commerce, with the intent to organize, promote, and participate in a riot, or with the intent to aid and abet a person participating in a riot, in violation

¹ In particular, 18 U.S.C. §§1959(a)(2) and (3) criminalize committing state crimes involving maiming, assault with a dangerous weapon, and assault resulting in serious bodily injury in aid of racketeering. Likewise, 18 U.S.C. §1959(a)(6) criminalizes attempting or conspiring to commit those crimes in aid of racketeering. The applicable state laws are found at M.G.L.c. 265 §§14 (maiming), 15A(c) (assault with serious bodily injury resulting), and 15B(b) (assault with a dangerous weapon).

of 18 U.S.C. §2101;² aided and abetted such crimes, and conspired to engage in such crimes in violation of 18 U.S.C. §371 (the “SUBJECT OFFENSES”). Moreover, as detailed below, there is probable cause to believe that the locations to be searched (“SEARCH LOCATIONS”), which include two Hells Angels Motorcycle Club clubhouses in Massachusetts (the Cape Cod Charter and Salem Charter clubhouses), the residences of the [REDACTED] SUBJECTS, motorcycles used by the SUBJECTS during the attack to be seized and searched (“SUBJECT MOTORCYCLES”), and SUBJECTS, contain or possess evidence of crimes and property designed for use, intended for use, or used in committing crimes, namely, the SUBJECT OFFENSES.

6. Descriptions of each SUBJECT’s conduct, appearance, motorcycle, and residence are set forth in detail in Schedule I to this Affidavit. *David H. Kennedy* Schedule I is fully incorporated into this Affidavit. Separate descriptions of each SEARCH LOCATION, to be appended to each location warrant, are attached hereto in Attachments A-[REDACTED] through A-[REDACTED]. Separate description of each SUBJECT, to be appended to the individual warrants, are attached hereto in Attachments AA-[REDACTED] through AA-[REDACTED]. Separate descriptions of each SUBJECT MOTORCYCLE, to be appended to the motorcycle warrants, are attached hereto in Attachments AAA-[REDACTED] through AAA-[REDACTED]. A specific lists of items to be searched for and seized from the SEARCH

² 18 U.S.C. §2101(a) reads in pertinent part:

Whoever travels in interstate or foreign commerce or uses any facility of interstate or foreign commerce, including, but not limited to, the mail, telegraph, telephone, radio, or television, with intent—(1) to incite a riot; or (2) to organize, promote, encourage, participate in, or carry on a riot; or (3) to commit any act of violence in furtherance of a riot; or (4) to aid or abet any person in inciting or participating in or carrying on a riot or committing any act of violence in furtherance of a riot; and who either during the course of any such travel or use or thereafter performs or attempts to perform any other overt act for any purpose specified in subparagraph [(1)-(4)] of this paragraph— Shall be fined under this title, or imprisoned not more than five years, or both.

The term “riot” means “a public disturbance involving (1) an act or acts of violence by one or more persons part of an assemblage of three or more persons, which act or acts shall constitute a clear and present danger of, or shall result in, damage or injury to the property of any other person or to the person of any other individual . . .”

LOCATIONS are attached hereto as Attachments B-█ through B-█. Specific list of items to be searched for and seized from the SUBJECTS are attached hereto as Attachments BB-█ through BB-█. Specific lists of items to be searched for and seized from the SUBJECT MOTORCYCLES are attached hereto as Attachments BBB-█ through BBB-█.

The Hells Angels Motorcycle Club

7. I have learned from my training and experience, and from law enforcement agents who have investigated HAMC charters for many years that the HAMC is an outlaw motorcycle gang (“OMG”)³ first organized in or about 1948 in San Bernardino, California and now operates both nationally and internationally. The HAMC has more than 1,000 members who belong to over 100 chapters or “charters” in the United States and numerous foreign countries, including seven charters in Massachusetts.⁴ Each charter of the HAMC has a leadership structure, including officers, such as a President, a Vice President, a Treasurer, a Secretary, and a Sergeant-at-Arms. The local charters adhere to a set of “World Rules,” as well as regional and charter rules. The local charter members vote for, and report to,

³ According to the U.S. Department of Justice, “Outlaw Motorcycle Gangs (OMGs) are organizations whose members use their motorcycle clubs as conduits for criminal enterprises. OMGs are highly structured criminal organizations whose members engage in criminal activities such as violent crime, weapons trafficking, and drug trafficking. There are more than 300 active OMGs within the United States, ranging in size from single chapters with five or six members to hundreds of chapters with thousands of members worldwide. The Hells Angels, Mongols, Bandidos, Outlaws, and Sons of Silence pose a serious national domestic threat and conduct the majority of criminal activity linked to OMGs, especially activity relating to drug-trafficking and, more specifically, to cross-border drug smuggling. Because of their transnational scope, these OMGs are able to coordinate drug smuggling operations in partnership with major international drug-trafficking organizations (DTOs).” See, <https://www.justice.gov/criminal-ocgs/gallery/outlaw-motorcycle-gangs-omgs>.

⁴ The HAMC charters in Massachusetts: Salem, Lowell, Springfield, Worcester, Berkshire County, Nomads and Cape Cod. The Cape Cod charter was re-established in early April 2022, after being dormant for more than a decade. The Cape Cod charter opened a clubhouse on American Legion Highway in Westport, Massachusetts in April 2022.

a national leadership. Local charters also participate in regional HAMC structures and meetings.

8. The HAMC, including those charters in Massachusetts, maintain a hierarchical command and control structure, and a system of discipline for members, prospects, associates, and rivals. Rules govern the conduct of its members, including rules about the use of violence to advance the interests of the organization, and for disciplining members and others for breaking HAMC rules. For example, a “patched” member of the HAMC must obey the orders of the charter officers and the orders of officers of the national organization, just as HAMC recruits (referred to as “prospects”) and members of support motorcycle clubs must obey the orders of patched members. Likewise, engaging in violent acts and other crimes for the benefit of the organization increases and maintains the standing of a patched member, and will enhance a prospect’s chances of being promoted to a patched member. Similarly, if a member of an affiliate or support motorcycle club engages in violent conduct on behalf of the HAMC, that affiliate member will increase his status with the HAMC, and the likelihood that he will be invited to become a prospect in the HAMC. By contrast, failure to obey an HAMC order or rule can result in a range of disciplines from a fine, to a violent beating, to being forced out of the HAMC, and other more serious consequences.

9. The HAMC adheres to a one-man/one-vote rule, which means each member votes on a litany of motions, elected positions and other internal decisions. Meetings of the individual HAMC charters, also known as “church,” occur approximately once a week. Attendance is mandatory for all members unless the absence is excused by the charter. Club business and finances are discussed at “church,” including upcoming plans for benefit rides (also known as “runs”), “power rides” (as explained below), disciplinary issues within a charter,

and the appropriate means of addressing rival motorcycle clubs. I have learned from my training and experience, and from law enforcement experts who have executed warrants on HAMC clubhouses, the homes of HAMC members, and other locations, that charters have been found to keep written records of what transpires at “church,” as well as minutes of regional officers’ meetings, written financial records, written membership records, and, in some cases, written rules of the HAMC. These records are typically maintained in the charter clubhouse. In prior searches of such clubhouses, law enforcement agents have found such records in both paper and electronic form. In addition, I know of one recent instance in which a HAMC member was arrested on his motorcycle and had in his possession notes from a HAMC regional meeting.

10. Among the HAMC rules are stringent rules about how members, prospects, and others may wear and display HAMC vests, also known as “colors” or “cuts,” and the patches or “tags” displayed on those cuts. For example, on the back of a HAMC member’s colors, he wears a four-piece patch. A member has a “top rocker” stating “Hells Angels.” Below the top rocker is the HAMC moniker, the image of a distinctive winged “death head.” Below the “death head” is a small rectangular “MC” patch, standing for motorcycle club. At the bottom of the colors is a “bottom rocker” designating a geographic area where the charter is located. The bottom rocker also denotes a geographic area over which the HAMC in that region has declared dominance. Since the HAMC has declared dominance over the entirety of Massachusetts, New Hampshire, and Rhode Island, HAMC members and prospects within those states wear a Massachusetts, New Hampshire, or Rhode Island bottom rocker. Unlike a HAMC member, a HAMC prospect may only wear the location “bottom rocker” on the back of his cut, without the “death head” or the “Hells Angels” top rocker.



Unidentified Hells Angels members with a "top rocker," HAMC "death head" moniker, and Massachusetts/New Hampshire "bottom rocker"

11. HAMC charters typically maintain clubhouses. HAMC clubhouses are utilized for parties, social gatherings, meetings and a location where members or prospects may reside. Clubhouses may also be used to store and repair motorcycles. Traditionally, the HAMC holds their weekly church meetings at the clubhouse, typically in a room designated with a long table and chairs.

12. During multiple search warrants conducted by law enforcement agencies, they have recovered paper and electronic charter membership rosters, east and west coast membership phone rosters, as well as membership rosters for their primary support clubs. Law enforcement has also recovered patched motorcycle vests of former members or prospects that had been kicked out or left the club. Law enforcement has also regularly recovered firearms or non-conventional weapons, such as hammers, ax handles, get-back whips, flashlights and knives from clubhouses. They have also recovered stacks of Hells Angels patches or "tags" and stickers. Law enforcement has also seized weekly church meeting notes and west coast and east coast officers meeting minutes, both electronic and paper. Historically, the HAMC charters

hang in the clubhouse their adversaries' colors or indicia worn by their enemies that were stolen during an act of violence. They refer to these items stolen from rival clubs as "trophies" and are a show-of-force or power to non-OMG members and support clubs that visit their clubhouse. Routinely, OMGs will hang their adversaries' colors or indicia upside down as a sign of disrespect. In addition, clubhouses are regularly used to park, store, and repair members' motorcycles on club property.

13. For decades, HAMC charters, including those in Massachusetts, have engaged in a wide range of criminal activity, including drug trafficking, in violation of 21 U.S.C. §§ 841 and 846; extortion, in violation of state law; witness intimidation, in violation of 18 U.S.C. § 1512; and various types of violent assaults, including murder, in violation of state law. *See, e.g. United States v. Pasciuti*, 803 F. Supp. 499, 506 (N.H. 1992) (documenting how the Lowell, Massachusetts charter of HAMC notoriously intimidates witnesses). I know from my training and experience, and from information from other law enforcement officers with extensive knowledge of the HAMC, that members of the HAMC have regularly extorted individuals, using the threat of physical violence, to obtain the property of these individuals, including motorcycles. With regard to the HAMC in Massachusetts, its members have been convicted of engaging in a range of narcotics crimes as well as violence in aid of racketeering. For instance, in 2014, five HAMC members, including [REDACTED] Marc ELIASON, were convicted in connection with the violent assault on an affiliated OMG member for that affiliate's failure to attack a former member of the HAMC. *See, United States v. Barr, et al.* (D. Mass. 1:14-cr-10002-NMG).⁵ [REDACTED] Eliason and others also extorted that individual to surrender his

⁵ [REDACTED] ELIASON, a patched member of the Salem Charter of the HAMC, was convicted in this case on five counts of 18 U.S.C. §1959, and sentenced to 97 months

motorcycle to the HAMC under threat of violence. *Id.*⁶ More recently, the past President and leader of the Salem Charter of the HAMC, Christopher Ranieri, is on trial in California on RICO murder charges. *See United States v. Christopher Ranieri a/k/a "Rain Man," et al.*, 3:17-cr-00533-EMC (N.D.C.A. 2017).

14. Members of the HAMC in Massachusetts have also been involved in the trafficking of controlled substances, including marijuana, methamphetamine and cocaine, at street level, as well as the transportation of drugs interstate. For instance, [REDACTED] Anthony EICKS was convicted in 1998 of conspiring to distribute methamphetamine and cocaine and was sentenced to 216 months incarceration. *See United States v. Antony EICKS, et al.*, 1:96-cr-10252-EFH (D.Mass. 1996). His co-conspirators in that matter were other members of the Hells Angels in Massachusetts, one of whom, Sean Barr, was later convicted with [REDACTED] Marc ELIASON on VCAR charges noted above. In addition, as set forth in greater detail below, [REDACTED], the criminal activities of members of the HAMC and SWMC in Massachusetts continue to this day. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

imprisonment followed by five years of supervised release in May 2015. He remains on federal supervised release.

⁶ In pleading guilty to these crimes, [REDACTED] ELIASON and his co-defendants admitted that the Hells Angels Salem Charter was a racketeering enterprise.

15. Among the purposes of the HAMC are: preserving and protecting the power, territory, and profits of the enterprise through the use of intimidation, violence, and threats of violence; promoting and enhancing the enterprise and its members' and associates' activities; keeping rival motorcycle club members and others in fear of the enterprise and in fear of its members and associates, through violence and threats of violence; and providing support and information to members and associates, including those who have been incarcerated for committing acts of violence or threats of violence in furtherance of the interests of the HAMC.

16. I have learned from my training and experience as well as from law enforcement officers with extensive experience with the HAMC that HAMC charters and support clubs engage in "power runs" to demonstrate their control over particular geographic locations. Power runs are motorcycle rides of a large group of HAMC members and affiliates, many of whom are armed with hammers, knives, and clubs, for the purpose of intimidating and provoking rival OMGs, and instilling fear in others. Power runs are typically done in formation with the leadership of the charter riding out front, with senior members of the club following, followed by prospects and support club members, and followed by at least one "chase car." Because OMG members are often subject to law enforcement stops and searches, the less detectible chase car will be used to carry firearms if they are needed during the power run. While women associated with the HAMC are often present at benefit or recreational runs, women are not present during power runs because of the potential for violence.

The Sidewinders Motorcycle Club

17. The Sidewinders Motorcycle Club is an affiliate or "support club" for the HAMC in Massachusetts. The SWMC has a clubhouse in Fall River, Massachusetts, and, like the HAMC, are rivals of the PMC. Like other HAMC support clubs, the SWMC members and

prospects attend HAMC social events, join HAMC power runs, benefit runs, and recreational runs, and execute tasks (including criminal conduct) on behalf of HAMC members. Support clubs are subservient to the HAMC, and routinely follow orders issued by the HAMC. Several current members in the HAMC charters in Lowell, Salem, and Cape Cod, Massachusetts, have joined the HAMC after being members of the SWMC. Like the HAMC, the SWMC has distinctive colors and a four piece patch. On the back of a SWMC member's colors, he has a top rocker stating "Sidewinders." Below the top rocker is their center moniker, a distinctive skeleton skull with a snake wrapped around it. Below the moniker is a small rectangular "MC" patch, standing for motorcycle club. At the bottom of the colors is a "bottom rocker" designating a geographic area like "Massachusetts" where the charter is located.⁷ Similar to the HAMC, SWMC members and prospects have been arrested for a wide range of criminal conduct while wearing their colors or other indicia of SWMC membership.



The Enterprise

⁷ The SWMC, as an affiliate club of the HAMC, has been granted permission by the HAMC in Massachusetts to also use a "Massachusetts" bottom rocker.

18. As outlined above, and as supported below, there is probable cause to conclude that the HAMC in Massachusetts, including its leaders, members, prospects, associates and support club affiliates, including the SWMC in Fall River, is an enterprise as defined in 18 U.S.C. §1959(b)(2), in that it is a group of people associated in fact, which is engaged in, or the activities of which affect, interstate or foreign commerce. The enterprise constitutes an ongoing organization whose members function as a continuing unit for a common purpose of achieving the objectives of the enterprise.

HAMC Dispute with the Pagans

19. Since 1972, the HAMC and Pagan Motorcycle Club⁸ have been entrenched in a long-standing violent struggle over control of geographic locations. As noted above, the HAMC has been established in New England for many years, and has declared dominance over a number of New England states, including Massachusetts, Rhode Island, and New Hampshire. The bottom rocker of HAMC motorcycle vests in those states reflect their claim to these locations. Throughout the country the PMC has been expanding its membership and opening chapters in locations where the HAMC have traditionally been dominant. As a result, violent conflicts have arisen between the HAMC and the PMC and their support clubs. The PMC opened a Fall River chapter in or about 2018, at a time when the HAMC in South Coastal Massachusetts was in disarray. While the HAMC had a Cape Cod Charter clubhouse in Wareham, Massachusetts that clubhouse had closed and the charter was largely dormant. In late 2021 or early 2022, the PMC chapter in Fall River moved into a new clubhouse at 1375 Pleasant Street in Fall River.

⁸ The Pagan's Motorcycle Club (PMC) is an OMG and rival of the HAMC and the SWMC. The PMC opened its first chapter in 1959, and has since expanded to approximately 2,000 members in more than 160 chapters. The PMC wears a four-piece patch set on the back of their denim motorcycle vests similar to the patches on the back of the HAMC and SWMC vests.

Similarly, in April 2022, the HAMC opened a new clubhouse at 560 American Legion Highway in Westport, Massachusetts. A large “Hells Angels of Cape Cod” sign was placed on the road in front of the Westport clubhouse property. It was apparent from this change, that the HAMC was intending to reassert its dominance in South Coastal Massachusetts.

20. In a related development, according to recently seized minutes of a regional meeting of HAMC charters, in early April 2022, the HAMC national organization declared a nationwide “green light” on the PMC. Based on my training and experience and law enforcement experts with whom I have consulted, the term “green light” means that any person associated with the HAMC should “attack on sight” any person affiliated with the PMC.

The May 14 Gathering: Route 24 Rest Stop

21. On May 14, 2022, between approximately 9:30 and 11:30 am a large group of HAMC and HAMC support club riders gathered at the southbound rest stop of Route 24 in Bridgewater, Massachusetts. As many as 100 riders gathered there that morning. I have reviewed footage from multiple security cameras operated by the Mobil gas station at that location, from both inside the Mobil market and the areas around the gas pumps. Those security cameras produce high quality images of individuals coming and going from the gas station rest area on the morning of May 14, 2022. From that security camera footage I could discern that the group gathered that morning included, as identified by their patches and other features: members of the Salem Charter of the HAMC; members of the Lowell Charter of the HAMC; members of the Cape Cod Charter of the HAMC; a member from the Massachusetts Nomads Charter of the HAMC; members of the HAMC from two New Hampshire charters; members of the SWMC; members from two additional OMGs affiliated with the HAMC; as well as HAMC prospects and SWMC prospects. These individuals appeared on security

camera footage putting gas in their motorcycles, paying at the pumps, socializing at the pumps and near the pumps, and purchasing items inside the market. Many of these individuals removed their helmets or lifted their visors so that their faces were readily identifiable. In addition, the high resolution security camera footage revealed motorcycle license plates/registrations, close-up images of riders' clothing, eyewear, footwear, gloves, leather vests with patches of their clubs on them, detail from helmets, tattoos, and unique features of the motorcycles. Images from these security cameras also revealed riders talking and otherwise using their mobile telephones while at and around the gas pumps, and at least one motorcycle with an on-board navigation system. Security footage from this location provided the basis for the identifications of many of the SUBJECTS, as set forth in Schedule I to this Affidavit.⁹

22. Notably, the security cameras were not the only devices capturing images at the Route 24 rest area on the morning of May 14, 2022. At least one HMAC member, Jeremy Borges, used his mobile phone to take selfies with the group and post them on his Facebook site:

⁹ At this stage of the investigation we have only sought to identify the SUBJECTS involved in violent activity in Fall River. Many other ride participants are likely to be identified upon further analysis of the recordings.



23. In addition, the Vice President of the newly opened HAMC Cape Cod charter, Christian Rufino, used his mobile phone to post images of the group at the rest stop on the “SYLA” Facebook site.¹⁰

¹⁰ SYLA (an acronym for “Support Your Local Angels”) operated a clubhouse in the same location on American Legion Highway in Westport for approximately two years before the HAMC opened its clubhouse there. Rufino has posted selfies, images from HAMC events, and HAMC merchandise for sale on the SYLA Facebook account since approximately June 2020. During that time Rufino was a member of the Salem Charter of the HAMC.



24. Based on my training and experience, and well as the expertise of other law enforcement officers with extensive knowledge of the HAMC, this gathering and the subsequent ride was a HAMC “power run” for the purpose of showing force and intimidating rival OMGs and others. It was also intended to reassert the HAMC’s dominance in the area, and demonstrate a multi-state show of force in support of the new HAMC Cape Cod Clubhouse in nearby Westport, Massachusetts. Given the HAMC “green light” on the PMC, any encounters with PMC members would likely result in violence. As set forth below, the nature and purpose of this ride was also confirmed by two CIs with close ties to members of the

HAMC and its support clubs.

May 14 Power Run to Fall River

25. After gathering at the Bridgewater rest stop, at approximately 11:30 am, the group of approximately 100 riders rode south towards Fall River. The Fall River Police Department operates a Flock safety camera system on certain roadways in the city. The Flock system captures the rear of vehicles driving past, including detailed images of license plates. On May 14, 2022, a Flock camera was in operation at the intersection of Pleasant Street at Quarry Street in Fall River. This location is less than ½ of a mile from the PMC clubhouse at 1375 Pleasant Street. At approximately 12:19 pm (the time according to the Flock system), the Flock system captured a large group of riders traveling east on Pleasant Street in Fall River, towards the PMC clubhouse. The Flock system captured close-up images of these groups of motorcycles and their registrations. The system also captured close-up images of many of the SUBJECTS, as set forth in Schedule I, to include: license plates, clothing, footwear, leather vests with patches, helmets (including stickers on helmets), tattoos, and detailed information about the motorcycles. The images are readily comparable to the images of riders captured at the Route 24 rest area earlier that morning.

26. In the immediate vicinity of the PMC clubhouse at 1375 Pleasant Street, there were at least three surveillance/security systems in operation at mid-day on May 14, 2022. One system, consisting of a single camera mounted above street level and just west of the PMC clubhouse was operated by the Fall River Police Department. That camera footage provided a view of the front of the PMC clubhouse, as well as the fronts of several buildings on either side of the clubhouse. In addition, the Fall River Police Department camera captured the sidewalk in front of those buildings as well as portions of the street in front of those buildings. The

camera is some distance from the front of the clubhouse and while clothing, helmets, body shape, vehicles, and some weapons can be discerned from the footage, the camera does not provide sufficient detail to show either license plate numbers of motorcycles or facial features.

27. The second system in operation at mid-day on May 14, 2022, in the vicinity was a five camera system owned and operated by a business opposite the PMC clubhouse. Those cameras captured a range of images from Pleasant Street and Thomas Street, and captured portions of the attack which are not visible on the Fall River Police camera. While these five cameras captured images from a closer range than the Fall River Police Department camera, as of this date images from the cameras have not been enhanced. Nonetheless, the cameras provide clearer and closer-up images of the events on Pleasant Street that day than the Fall River Police Department camera. Relevant footage from the cameras is summarized by SUBJECT in Schedule I to this Affidavit.

28. The third system in operation at mid-day on May 14, 2022, was a system with one usable camera operated by a business approximately 30 yards from the front of the PMC clubhouse on Pleasant Street on the same side of the street. This camera captured images of persons and objects on Pleasant Street. The three of these systems together will be referred to herein as the "Pleasant Street cameras."

The May 14 Attack

29. Based on a review of the footage from the Pleasant Street cameras, on Saturday, May 14, 2022, at approximately 12:20 pm, a group of approximately 40 HAMC and other OMG riders, including each of the SUBJECTs, had broken off from the larger group and traveled east on Pleasant Street past the entrance to the PMC clubhouse. The investigation has revealed that that a number of PMC members were present inside and outside the clubhouse

that day, along with a few girlfriends and wives. The PMC had planned a benefit run that day, and had invited PMC members from other chapters.

30. A few minutes after the HAMC-affiliated riders rode past, the Pleasant Street cameras revealed that the group circled back, returning to the vicinity from the west. Members of the group, including the SUBJECTS, pulled over on both sides of the street and the sidewalk in the area of the PMC clubhouse, quickly parked their bikes, and dismounted. Approximately twenty-five individuals, all but two wearing a HAMC or SWMC vest,¹¹ including the SUBJECTS, then engaged in an armed assault on those PMC members who had been standing and walking outside the clubhouse. The Pleasant Street cameras revealed the SUBJECTS using clubs, hammers, and knives in the course of the attack. An additional dozen or more HAMC members and associates were present at the scene and provided support by blocking traffic and serving as lookouts during the attack.

31. The gathering of PMC members that morning was substantially smaller than the group of attackers. There were six or seven members of the PMC who were the subject of the HAMC/SWMC attack, each of whom had been on the sidewalk outside the PMC clubhouse when the riders arrived. At least six of them sustained significant injuries including a skull fracture, stab wounds, slashing wounds, and blunt force trauma. Several PMC members were taken to the hospital. Two remained hospitalized for a number of days after the attack.

32. The locus of the most violent altercation was on the curb in front of 1337 Pleasant Street, near the PMC Clubhouse. There, two PMC affiliates, referred to herein as Victim 1 and Victim 2, were assaulted with hammers and stabbed with knives by members of

¹¹ There was one attacker without a vest who was identified as [REDACTED]. There was one attacker wearing a Horror Merchant Motorcycle Club vest. The Horror Merchants are another HAMC support club.

the HAMC and SWMC, including several of the SUBJECTS, and left unconscious. Victim 1 was impaled with a dagger which was still protruding from his upper body when Fall River officers arrived. Victim 1 was transported to Rhode Island Hospital in serious condition. Victim 2 required a tourniquet to stem the flow of blood from deep lacerations on his arm. He, too, was taken by ambulance to the hospital. In addition to the injuries sustained by Victim 1 and Victim 2, responding officers discovered four other individuals who sustained serious wounds, including lacerations to one individual's head, a stab wound to another individual's wrist, and blunt force trauma to several others.



Victims 1 and 2 as officers found them immediately after the attack.

33. As detailed in Schedule I, the SUBJECTS have been identified as the active perpetrators in this attack. Each is affiliated with the HAMC, as a member or prospect, or with the SWMC, as a member or a prospect. As detailed in Schedule I, several of SUBJECTS were carrying weapons when they arrived on scene and took them from their motorcycle or person to use in the attack. Likewise, several of the SUBJECTS returned to their motorcycles with their weapons and took them as they fled. Notably, some of the SUBJECTS wielded the HAMC

weapon of choice: the ballpeen hammer. Two ballpeen hammers were found on the ground at the crime scene, along with the knife which was used to impale Victim 1. The weapons have been submitted for forensic testing. Among other things, the search warrants in this case seek to recover other weapons which were taken from the scene by the SUBJECTS.

34. Photographs of the scene immediately after the attack reveal notable amounts of the victims' blood on the sidewalk, on the street adjacent to the sidewalk, spatter and smears on the sides of cars near the attack, spatter on the sides of buildings, and spatter on at least one motorcycle visor found at the scene of the attack, which appears to have been knocked off the helmet of [REDACTED] during the altercation. In the course of the attack, there is probable cause to believe that the SUBJECTS got blood spatter on their clothing, particularly their motorcycle vests, gloves, helmets, pants, and shoes. In addition, it is likely that they stepped in blood during and as they left the attack scene. Therefore, the search warrants seek the clothing and equipment worn by the SUBJECTS, as well as to take forensic samples from the motorcycles where blood may have been left by shoe soles, gloves, or other clothing.

May 14 Flight after the Attack

35. The Pleasant Street cameras reveal that after beating and stabbing PMC members, the SUBJECTS and others assisting them withdrew from the vicinity of Pleasant Street. The attack lasted less than three minutes. The Fall River Police Department also operates a Flock camera system on Martine Street. That camera is approximately one mile southeast of the PMC clubhouse. At approximately 12:27 pm, the Flock system on Martine Street captured a large group of riders traveling east, away from the PMC clubhouse, and generally in the direction of the HAMC Cape Cod clubhouse in Westport, Massachusetts. As with the Pleasant Street Flock system, the Martine Street system captured close-up images of

groups of motorcycles, their registrations, and riders. The system captured detailed images of several SUBJECTS, as set forth in Schedule I, to include: license plates, clothing, gloves, footwear, leather vests with patches, helmets (including stickers on helmets), tattoos, and detailed information about the motorcycles.

Surveillance of the HAMC Cape Cod Charter Clubhouse

36. At approximately 12:30 pm, a Westport Police detective located in Westport, Massachusetts near the intersection of Briggs Road and Sanford Road reported hearing a large number of motorcycles operating at what he believed to be a high speed. This intersection is approximately two miles from the HAMC Cape Cod Charter clubhouse, and between the PMC clubhouse and the HAMC Cape Cod Charter clubhouse.

37. At approximately 12:35 pm, on May 14, 2022, an investigator conducted surveillance at the HAMC Cape Cod Charter clubhouse, 560 American Legion Hwy, Westport, Massachusetts. The structure on the property is set back from the road and accessed via a gated driveway. The clubhouse structure cannot be seen from the public way because of trees and other undergrowth. Investigators observed the main gate to the property was guarded by three individuals wearing HAMC motorcycle vests. The investigator observed multiple motorcycles parked behind the gate and on the property. These observations suggested that some of the SUBJECTS and others involved in the attack on the PMC fled for the most immediate cover of a local clubhouse. (The HAMC clubhouse is an approximately 12 minute drive from the PMC clubhouse in Fall River driving at the speed limit.) Likewise, the presence of many HAMC members in Westport also suggests that weapons and other incriminating items from the crime scene could have been concealed at the clubhouse shortly after the attack.

38. Over a period of several hours beginning at 2:30 pm, investigators observed

numerous cars come and go from the property, and more than a dozen motorcycles leaving the property at broken intervals and at high rates of speed. The motorcycles, some of which were operated by motorcyclists who did not have on their leather vest, departed in different directions. Investigators believe, based on training and experience and consulting with other law enforcement officials who have long experience with the HAMC and other OMGs, that this was done to avoid detection and continued surveillance by law enforcement. By departing at broken intervals and at high rates of speed, law enforcement officers were unable to follow and surveil all departing members. Only one patched member of the HAMC was seen leaving the clubhouse that afternoon: [REDACTED]

[REDACTED]

Post-Attack Interviews

39. During the week of May 21, 2022, investigators separately interviewed two Confidential Informants (“CI-1” and “CI-2”) in connection with this matter. CI-1 is a known longtime associate of the HAMC in Massachusetts. [REDACTED]

[REDACTED]¹² CI-1 told investigators that CI-1 has known a member of the HAMC [REDACTED]

¹² CI-1 spoke to investigators on condition of confidentiality. However, CI-1 asked nothing in return for the information she/he provided. [REDACTED]

[REDACTED]

[REDACTED] CI-1 has also been incarcerated on numerous occasions, [REDACTED]

[REDACTED] CI-1 readily admitted that she/he was currently engaged in distributing narcotics in Massachusetts. [REDACTED]

[REDACTED] I also note [REDACTED]

41. During the week of May 21, 2022, investigators separately interviewed CI-2.¹⁴

CI-2 has a regular relationship with [REDACTED] HAMC and SWMC members [REDACTED]
[REDACTED], and frequently communicates with them. [REDACTED]
[REDACTED]. CI-2 independently confirmed that the HAMC run on May 14, 2022, was
a planned “power run” that was led by the Cape Cod and Salem Charters of the HAMC. CI-2
believed that even though the run was a power run, she/he thought the violence was not planned
in advance but was provoked when the HAMC first rode by the PMC clubhouse. CI-2 advised
that the HAMC Salem Charter is considered to be the most powerful HAMC Charter in
Massachusetts and that it is known for violence. CI-2 also told investigators that firearms are the
first weapon of choice for HAMC members, but that hammers are also a weapon of choice
because, among other things, carrying a hammer is not illegal. CI-2 has also advised
investigators that in the last year she/he has been offered distribution quantity narcotics,

[REDACTED] from a [REDACTED] the HAMC
[REDACTED] and [REDACTED] the SWMC. [REDACTED]
[REDACTED]
[REDACTED]

¹⁴ CI-2 has provided information to law enforcement for more than a year regarding the activities of various OMGs in the region, including narcotics trafficking. Much of CI-2’s information has been independently corroborated in the past and therefore deemed reliable. During this period, CI-2 was paid both for information and for participating in controlled purchases of narcotics. During the course of her/his cooperation, CI-2 routinely provided specific names of individuals engaged in criminal conduct and details of their involvement. These details are not included in this affidavit to protect the confidentiality of CI-2. CI-2 has a criminal history to include [REDACTED]
[REDACTED]

Summary of Probable Cause

42. Based on the facts outlined above and in Schedule I, there is probable cause to believe the attack¹⁵ was committed by members and associates of the HAMC and SWMC, including the SUBJECTS, against PMC members as part of an ongoing geographic dispute between long-standing rival OMGs, in violation of the SUBJECT OFFENSES. In particular, there is reason to believe that this attack was aimed at re-establishing the HAMC's dominance in South Coastal Massachusetts and challenging the PMC's presence in Fall River. Moreover, based on the presence of New Hampshire HAMC members, Massachusetts HAMC and SWMC members who live out of the Commonwealth of Massachusetts, as outlined in Schedule I, there is probable cause to believe that individuals crossed state lines to participate in the violent attack on the PMC in Fall River. In addition, given the use of a means of interstate communication – in this case, among other things, mobile phones used to capture and post on social media images from the power run on May 14, 2022, as set forth above – there is probable cause to conclude that a facility of interstate commerce was used to promote the power run and the ensuing attack on the PMC clubhouse.

43. There is also probable cause to believe that the SUBJECTS engaged in the power

¹⁵ While the conduct described herein, and Schedule I, is referred to generally as an “attack” on members of the PMC, the conduct qualifies as one or more racketeering acts under 18 U.S.C. §1961(1) as the perpetrators’ attempted murder of Victim 1 by striking him in the head with a hammer, stabbing him repeatedly, and impaling him with a knife which they left in his upper body. Victim 2 also had multiple serious stab wounds, Victim 3 was beaten with all manner of weapons, and Victim 4 was hit in the front and back of the head with blunt objects. This conduct qualifies as an “assault with a dangerous weapon” and as an “assault resulting in serious bodily injury” under 18 U.S.C. §1959(a)(3), and as an “act or acts of violence . . . [which] constitute a clear and present danger of, [or] results in, damage or injury to the property of any other person or to the person of any other individual...” under 18 U.S.C. §2102.

run and the attack on the PMC for the purpose of gaining entrance to or maintaining, or increasing position in the HAMC and, relatedly, the SWMC. As outlined above, and based on information I have gained from law enforcement experts on the HAMC and other OMGs, individuals are promoted, patched, tagged, and lauded within the HAMC and the SWMC for committing violent acts which promote the HAMC and its dominance in specific geographic areas. Individuals are promoted from prospect to member, and from member to officer, based in part on their willingness and ability to commit violent acts against any person, including other OMGs, who disrespect or challenge the HAMC or its affiliates.

Probable Cause for Search Locations

44. The [REDACTED] locations to be searched include the HAMC Cape Cod Charter clubhouse at 560 American Legion Highway, Westport, Massachusetts, the HAMC Salem Charter clubhouse at 19 Fayette Street, Lynn, Massachusetts, and the residences of the [REDACTED] identified in Schedule I.

45. With regard to the two clubhouses, there is probable cause to believe that there will be evidence of the SUBJECT OFFENSES found at the two clubhouses for the following reasons. First, both locations are plainly marked on the exterior as being Hells Angels clubhouses: large signs and death head symbols widely announce that they are the locus of HAMC activities in their respective regions. Second, both locations have been widely advertised on social media as being the homes of the Cape Cod and Salem Charters, respectively; the Cape Cod clubhouse has appeared repeatedly on the SYLA Facebook site and the Salem Charter clubhouse in Lynn has been advertised for years on the “Red & White 81 Salem” Facebook site as the locations of HAMC events, including social events and rides. Moreover, Salem Charter clubhouse on Fayette Street is owned by “HAMC Realty Trust.”

46. Third, law enforcement officers have engaged in surveillance at both clubhouses in connection with this investigation and have confirmed their active use by the respective clubs. Most recently, officers surveilled the Cape Cod clubhouse on June 30, 2022, and July 7, 2022, both Thursday nights, and have observed prospects and members coming and going from the clubhouse property consistent with “church” being held on Thursday nights. Officers surveilled the Salem Charter clubhouse on Wednesday July 6, 2022, and made similar observations of the arrival and departure of prospects and members consistent with “church” on Wednesday evenings. I also note that the Salem Charter clubhouse has been in the same location on Fayette Street since at least 2015, and over the years has been surveilled on numerous occasions by state law enforcement. Based on those earlier observations, the Salem Charter has regularly held “church” on Wednesday nights. Fourth, based on law enforcement experts’ long experience investigating the HAMC and related OMGs, and searching their clubhouses has revealed that such locations regularly contain financial records, membership records, notes and minutes of meetings, such as votes on whether to engage in a multi-charter power run, and evidence of animus or competition with other OMGs, including the Pagans.

47. Fifth, searches of HAMC clubhouses have revealed that these locations have been frequently used to store or conceal weapons, and to store and repair motorcycles when not in use. Sixth, and as outlined above, prior searches of HAMC clubhouses have revealed that the HAMC collects trophies from incidents of violence against other OMGs, including vests from other OMGs, which they display upside down in a sign of dominance and disrespect. Seventh, as outlined above, there is probable cause to believe that some of the SUBJECTS and their conspirators fled to the Cape Cod Charter clubhouse immediately after the attack, to regroup, potentially conceal evidence, and plan a way to leave without being followed and interdicted by

law enforcement.

48. There is also probable cause to believe that the residences to be searched will contain evidence of the SUBJECT OFFENSES. Prior searches of HAMC and other OMG residences have routinely resulted in the seizure of OMG clothing, motorcycle vests, motorcycle equipment including gloves and helmets, motorcycles, weapons, mobile phones, and indicia of participation in, or support for the HAMC, such as memorabilia, and the like. In this matter, there is probable cause to believe that clothing worn on the day of the attack, including footwear, motorcycle vests, gloves and helmets will be found at the SUBJECTS' residences.¹⁶ Those items are evidence of identity, association with the HAMC and SWMC, and will also be tested for biological evidence, including blood residue of the victims. Similarly, because the searches are planned for a time early in the morning when the SUBJECTS are still home, there is probable cause to believe that the SUBJECTS' mobile phones will be present in the residences. Likewise, there is probable cause to believe that the SUBJECT MOTORCYCLES will be located at one of the SUBJECT LOCATIONS.

Probable Cause for Subjects & Motorcycles

49. In the event that one or more SUBJECT is not located at one of the SUBJECT LOCATIONS during the time of the search, or that the SUBJECT MOTORCYCLES are not located at one of the SUBJECT LOCATIONS during the time of the search, investigators also seek warrants to search for evidence of the SUBJECT OFFENSES for each of the SUBJECT's

¹⁶ Based on my training and experience, people routinely re-wear clothing and accessories and store these items in their homes. Clothing and accessories consistent with those worn by the SUBJECTS on May 14, 2022, constitute evidence of the commission of the offenses discussed herein, in part that the SUBJECTS can be visually identified as the individuals in the photos and videos discussed above, in part through the distinct attire and accessories worn that day.

persons, and for the SUBJECT MOTORCYCLES. For all the reasons outlined above there is probable cause to believe that evidence of the SUBJECT OFFENSES will be found on the SUBJECTS and on the SUBJECT MOTORCYCLES. Among other things, there is reason to believe that if not at home, the subjects will be wearing items of clothing and equipment worn on the day of the attack, such as their motorcycle vest, helmet, gloves, and shoes. In addition, the SUBJECTS are likely to be carrying the mobile phone carried during the attack. Likewise, the SUBJECT MOTORCYCLES are likely to contain evidence of the crime, including the means of further identifying the unique features of the motorcycles, biological evidence as outlined above, and weapons contained in the storage cases or concealed in other places on the motorcycle.

50. The evidence to be seized includes that outlined in Attachments B through B (for places), BB through BB (for persons), and BBB through BBB (for motorcycles). Note that with regard to the SUBJECT MOTORCYCLES, agents will make efforts to collect necessary evidence from the motorcycles at the scene if possible, rather than to seize them and remove them from the location. However, if a complete search of the motorcycle, its photographing, and the collection of biological evidence from the motorcycles is not feasible on scene, agents will seize the vehicle and make efforts to return them in a reasonable period of time.

Seizure Of Mobile Devices And Data

51. The applications also seek to seize and search the SUBJECTS' mobile devices, including mobile telephones, and any electronic device capable of storing or sending geolocation information which is affixed to, or capable of being affixed to, the SUBJECT MOTORCYCLES.

[REDACTED]

[REDACTED]

[REDACTED]. Likewise, with regard to the search of the HAMC Cape Cod clubhouse in Westport, and the HAMC Salem clubhouse in Lynn, Massachusetts, the warrants seek to seize those records set forth in Attachments Bs in any format, including in digital format. As a result, additional probable cause for the seizure of computers is specified in Schedule I for the clubhouses.

52. With regard to mobile phones sought in the warrants, based on my training, experience, and information provided by other law enforcement officers, I know that many mobile phones can now function essentially as small computers. Phones have capabilities that include serving as a wireless telephone to make audio calls, digital camera, portable media player, GPS navigation device, sending and receiving text messages and emails, and storing a range and amount of electronic data, including geolocation data. Examining data stored on devices of this type can uncover, among other things, evidence of geolocation, communications evidence that reveals or suggests who possessed or used the device.

53. With regard to the likelihood that each SUBJECT possessed a mobile phone on May 14, 2022, and that the phones will have evidence of the SUBJECT OFFENSES, as noted above, at least two HAMC members used such devices to post images to the Internet of the Route 24 rest stop on the day of the ride, and at least two other participants at the ride can be seen on camera footage using their mobile devices while getting gas at this Mobil station. In addition, both the HAMC Cape Cod Charter and the HAMC Salem Charter use social media to promote their activities, to sell merchandise, and to connect with their supporters, and mobile devices are a common way of accessing such social media sites. As mentioned above, the SYLA ("Support Your Local Angels") Facebook page associated with the HAMC Cape Cod Charter has been used since 2020 to advertise merchandise, to notify supporters that the club will be

open, and to otherwise promote the HAMC. Likewise, the Salem charter uses “Red & White 81 Salem” as their Facebook page, notifying supporters that “Website will be going live by April! All upcoming events and merchandise will be available for purchase online.” Posts from “Red & White 81 Salem,” date back several years, and include notification of upcoming rides and events open to supporters. The site also directs supporters to the Instagram page “HellsAngelsSalem” to “stay updated.” A post from “Red & White 81 Salem,” in February 2022, shows the charter membership in their vests posed behind a Harley-Davidson and in front of a wall painted with a graffiti “Angels.”

54. In addition to the charters being active on social media, the investigation has revealed that many of the SUBJECTS have a social media presence. SUBJECTS [REDACTED] [REDACTED] have Facebook pages, as does [REDACTED] [REDACTED]. At least one SUBJECT, [REDACTED], has an Instagram account. Notably, the Facebook pages associated with [REDACTED] [REDACTED] include images of them associated with the HAMC. Likewise a photograph of [REDACTED] in his HAMC vest appears on [REDACTED] Facebook page. I know from my training and experience that individuals with Facebook pages not only post images of themselves online, usually images created and sent with mobile devices, but also comment and “like” images posted by others, and communicate with each other by messaging within the Facebook software. In my training and experience, mobile devices are frequently used to interact with such social media sites.

55. In addition, as a general matter, I am aware of a report from the United States Census Bureau that shows that in 2016, among all households nationally, 89 percent had a

computer, which includes smartphones, and 81 percent had a broadband Internet subscription. Specifically, in 2016, when the use of smartphone ownership was measured separately for the first time, 76 percent of households had a smartphone and 58 percent of households had a tablet, and 77 percent of households had a desktop or laptop computer. Further, according to the Pew Research Center, as of 2019, 96 percent of adult Americans own a mobile phone, and 81 percent own a mobile phone with significant computing capability (a “smartphone”). The percentage of adults that own a smartphone is even higher among younger demographic groups: 96 percent of 18-29 year olds, 92 percent of 30-49 year olds, and 79 percent of 50-64 year olds owned smartphones in 2019.

Unlocking Mobile Devices

56. With regard to unlocking mobile devices, I know from my training and experience, as well as from information found in publicly available materials, that some models of cellphones offer their users the ability to unlock a device via the use of a fingerprint or through facial recognition, in lieu of a numeric or alphanumeric passcode or password. On the mobile devices that have this feature, the fingerprint unlocking feature is typically called Touch ID. If a user enables Touch ID on a given device, he or she can register up to 5 fingerprints that can be used to unlock that device. The user can then use any of the registered fingerprints to unlock the device by pressing the relevant finger(s) to the device’s Touch ID sensor. In some circumstances, a fingerprint cannot be used to unlock a device that has Touch ID enabled, and a passcode must be used instead, such as: (1) when more than 48 hours has passed since the last time the device was unlocked and (2) when the device has not been unlocked via Touch ID in 8 hours and the passcode or password has not been entered in the last 6 days. Thus, in the event law enforcement encounters a locked mobile device, the opportunity to unlock the device via Touch ID exists only for a short

time. Touch ID also will not work to unlock the device if (1) the device has been turned off or restarted; (2) the device has received a remote lock command; or (3) five unsuccessful attempts to unlock the device via Touch ID are made.

57. The passcodes that will unlock the mobile electronic devices to be seized in this matter are not currently known to law enforcement. Thus, it may be useful to press the finger(s) of the user(s) of the device to the device's fingerprint sensor or to hold the device up to the face of the owner in an attempt to unlock the device for the purpose of executing the search authorized by this warrant. The government may not otherwise be able to access the data contained on those devices for the purpose of executing the search authorized by this warrant. In addition, in my training and experience, the person who is in possession of a device or has the device among his or her belongings at the time the device is found is likely a user of the device. However, in my training and experience, that person may not be the only user of the device whose fingerprints are among those that will unlock the device and it is also possible that the person in whose possession the device is found is not actually a user of that device at all. Furthermore, in my training and experience, I know that in some cases it may not be possible to know with certainty who is the user of a given device, such as if the device is found in a common area of a premises without any identifying information on the exterior of the device. Thus, it may be necessary for law enforcement to have the ability to require any occupant of the Subject Premises to press their finger(s) against the sensor of the locked device(s) or place the devices in front of their faces in order to attempt to identify the device's user(s) and unlock the device(s).

58. For these reasons, I request that the Court authorize law enforcement to press the fingers (including thumbs) of the SUBJECTS and all individuals found at the SUBJECT LOCATIONS to the sensor of the devices or place the devices in front of their faces for the

purpose of attempting to unlock the device in order to search the contents as authorized by this warrant.

59. The law enforcement agents will endeavor to search and seize only the mobile devices of all SUBJECTS [REDACTED], which, upon reasonable inspection and/or investigation conducted during the execution of the search, reasonably appear to contain the evidence in Attachment B, BB, and BBB because they are associated with (that is used by or belong to) the SUBJECTS. If however, the law enforcement agents cannot make a determination as to use or ownership regarding any particular device, the law enforcement agents will seize and search that device pursuant to the probable cause established herein.

Good Cause to Commence Searches Before 6 a.m.

60. Your affiant also requests that the Court authorize law enforcement officers to execute the search warrants before 6 a.m. to ensure officer safety and to ensure that the SUBJECTS, and others associated with them, are not given the opportunity to conceal or destroy evidence. The warrants need not be executed before 4 a.m. First, the sun rises on the planned day of execution at 5:26 a.m. and it is light substantially before that hour. Given the number and variety of locations, staging the teams and executing the searches just before dawn will make it substantially less likely that they will be detected before they are prepared to conduct an orderly entry and search. Second, to ensure that evidence is not destroyed, law enforcement officers will attempt to execute all warrants simultaneously. Based on surveillance of the SUBJECTS and SUBJECT LOCATIONS, we have learned that several of the SUBJECTS typically leave their homes at or before 6 a.m. In addition, some of them leave their homes wearing their motorcycle vests, helmets, gloves, ride their SUBJECT MOTORCYCLE, and likely take their mobile

telephones. If some SUBJECTS are on the road or at work when the searches commence, they may be alerted to the searches before officers are able to interdict them. Moreover, if SUBJECTS detect staged law enforcement teams as they leave their homes, it is likely they will alert other SUBJECTS. Therefore, I respectfully request that the Court authorize that the warrants may be executed anytime between 4 a.m. and 10 p.m.

CONCLUSION

61. Based on the information described above, I have probable cause to believe that the SUBJECTS and as yet identified HAMC and SWMC members and associates, engaged in violent crimes in aid of racketeering, in violation of 18 U.S.C. §1959, a racketeering conspiracy in violation of 18 U.S.C. §1962(d), interstate travel, and the use of a facility of interstate commerce, with the intent to organize, promote, and participate in a riot, or with the intent to aid and abet a person participating in a riot, in violation of 18 U.S.C. §2101, and conspiring to do so in violation of 18 U.S.C. §371.

62. Based on the information described above, I also have probable cause to believe that evidence and instrumentalities of these crimes, as set forth in Attachments B, BB, and BBB, will be found at the SUBJECT LOCATIONS, on the SUBJECT MOTORCYCLES, and on the SUBJECTs, as set forth in Attachments A, AA, and AAA.

I declare that the foregoing is true and correct.

Keith Ledin / *DLV*
KEITH LEDIN
Massachusetts State Trooper
FBI Task Force Officer

Time and Date: 1:45 p.m. Jul 19, 2022

Notice is hereby provided that, pursuant to Federal Rule of Criminal Procedure 4.1, the affiant was sworn by telephone on the date and time indicated above.

David H. Hendress
Honorable David H. Hendress
United States Magistrate Judge



Schedule I



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Registration AFFA while wearing a black leather Hells Angels vest and helmet.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

HAMC Member Eric FRANCO

Address: 2209 Kirkbride Drive, Danvers, Massachusetts

Motorcycle: 2003 Black Harley Davidson, Model FXD, MA Reg. 2M8138, VIN 1HD1GHV133K319609

1. An analysis of the private security and law enforcement recordings from May 14, 2022, revealed that one of the perpetrators was Eric Franco (DOB 11/13/1974), a patched member of the HAMC, who resides at 2209 Kirkbride Drive, Danvers, Massachusetts. FRANCO owns a 2003 black Harley Davidson motorcycle with Massachusetts registration 2M8138. The motorcycle is registered in his name. The motorcycle is a Harley Davidson 100th Anniversary style motorcycle with no rear compartments and four distinctive small LED-type headlights in addition to a central headlight.

2. On May 14, 2022, at approximately 12:23 pm, the Pleasant Street cameras captured an individual identified to be FRANCO park his motorcycle on the westbound lane side of Pleasant Street in front of Gilbert's Jewelry Store located at 1370 Pleasant Street, approximately 20 yards from the PMC clubhouse. The individual identified as FRANCO dismounted his motorcycle and walked towards two PMC members who were standing on the sidewalk between 1367 and 1363 Pleasant Street. The individual, identified as FRANCO, was a white male, had a right arm covered in tattoos and was wearing: (1) a black t-shirt; (2) a black leather vest with a bottom rocker, a Death Head in the center, and a top rocker; (3) a full face black helmet; (4) blue jeans; (5) and light brown boots with a cream/white sole. The individual operated a distinctive black Harley Davidson motorcycle as described above, with the following license plate: 2M8138.

3. The person identified as FRANCO appeared to have the entire front of his full face helmet up and approached one of the two PMC members. FRANCO immediately began fighting with the PMC member and threw him to the ground. The recordings show FRANCO holding a weapon in his right hand and then swinging the weapon over and over while standing over one of the PMC members who was prone on the street. The individual believed to be FRANCO was also observed swinging the weapon and striking another PMC member on the ground nearby. Before jogging back to his bike, FRANCO stood over the first prone PMC member and struck the victim with an overhead jabbing motion to the victim's upper body area. Your affiant believes that FRANCO was impaling Victim 1 with a knife. The individual then got back on his motorcycle and drove east from the PMC Clubhouse. The first prone individual has since been identified as Victim 1, a patched PMC member. Victim 1 sustained serious injuries to include a skull fracture and stab wounds. When police arrived on scene, Victim 1 was unconscious and had a double-sided knife protruding from his upper body.

4. Your affiant identified FRANCO through several means. First, FRANCO is well-known to law enforcement officers from his interactions with them and is known to be a longtime member of the HAMC. He has an extensive criminal history including a federal

conviction for being a felon in possession of a firearm in violation of 18 U.S.C. §922(g). *See United States v. Eric Franco*, 1:11 CR 10228-DJC (D. Mass).²

5. Second, footage from the Mobil gas station on Route 24 south in Bridgewater at approximately 11:10 am on May 14, 2022, revealed an individual identified as FRANCO parked at the pumps engaging in a conversation with other patched members of the Hells Angels. The individual's face was exposed in this footage and your affiant recognized him from comparing enhanced images from the security system to photographs of him in law enforcement databases. In the Route 24 footage, the individual, with both arms covered in tattoos, was wearing: (1) a black t-shirt; (2) a black leather vest with a Massachusetts bottom rocker, a Death Head in the center, and a Hells Angels top rocker; (3) a full face black helmet; (4) blue jeans; and (5) light brown boots with a cream/white sole. The individual operated a black Harley Davidson motorcycle with Massachusetts registration 2M8138. Notably, the motorcycle was a Harley Davidson 100th Anniversary style motorcycle, it had no rear compartments, and it had four distinctive small LED-type headlights in addition to a central headlight.

6. Third, just minutes before the attack, footage from the Flock camera system located on Pleasant Street and Quarry Street eastbound showed an individual identified as FRANCO dressed as described above and driving a black Harley Davidson motorcycle bearing Massachusetts license plate 2M8138 near the front of the pack of HAMC members. The recordings captured an individual identified to be FRANCO travelling east on Pleasant Street at approximately 12:18 pm.

7. Fourth, on April 8, 2022, FRANCO and fellow HAMC member Anthony EICKS were stopped in Burlington, Massachusetts for travelling 80 miles per hour in a 55 mph zone on their motorcycles by the Massachusetts State Police. FRANCO was positively identified by officers wearing a black leather Hells Angels vest and was operating the same black Harley Davidson motorcycle bearing Massachusetts Registration 2M8138 that he operated on May 14, 2022.

8. Based on my review of the camera footage at the time of the crime, the Route 24 Bridgewater Mobil gas station recordings, the Flock camera system footage, and the April 8, 2022, interaction with law enforcement, I believe that Eric FRANCO participated in the attack on PMC members outside of their clubhouse located at 1375 Pleasant Street, Fall River, Massachusetts on May 14, 2022.

9. In connection with this investigation, I am applying to search FRANCO's residence for evidence of the crimes outlined herein. For the following reasons, I have probable cause to believe that FRANCO lives at 2209 Kirkbride Drive, Danvers, Massachusetts. First, on

² FRANCO was initially sentenced to 262 months' incarceration as an Armed Career Criminal. In the aftermath of *United States v. Johnson*, 576 U.S. 591 (2015), FRANCO's sentence was reduced to 100 months' incarceration. FRANCO was released from federal prison on or about August 29, 2018.

May 21, 2022, FRANCO returned from an international trip and passed through border control at Logan International Airport in Boston. He provided U.S. Customs and Border Protection the address of 2209 Kirkbride Drive as his residential and mailing address.

10. Second, FRANCO registered his black Harley Davidson motorcycle, Massachusetts registration 2M8138, at 2209 Kirkbride Drive. He also owns two pickup trucks registered under his name at 2209 Kirkbride Drive.

11. Third, on June 7, 2022, law enforcement agents observed FRANCO's black Chevy pickup bearing Massachusetts registration 1ETH37 backed into a parking spot next to a white garage that is to the right of the building where Apartment 2209 is located.

12. Fourth, on July 1, 2022, law enforcement agents observed a blue Chevy pickup bearing Massachusetts registration 8ZY349, also registered to FRANCO, parked outside the building where Apartment 2209 is located.

13. Fifth, on July 5, 2022, law enforcement agents conducted surveillance in the area of 2209 Kirkbride Drive. Investigators located both Chevy pickup trucks registered to FRANCO in the parking lot. In addition, on that same day, at approximately 7:35 am, investigators observed FRANCO walk out of the building that Apartment 2209 is located in and walk to the black Chevy pickup bearing Massachusetts registration 1ETH37. FRANCO entered the driver's door of his Chevy pickup and drove out of the complex.

14. On July 11, 2022, U.S. Postal Service confirmed that FRANCO receives mail at 2209 Kirkbride Drive, Danvers, Massachusetts.

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